

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
NEWNAN DIVISION**

**IN RE:** : **CASE NO. 21-10273-LRC**  
**JOHN RONALD LONG** : **CHAPTER 13**  
**DEBTOR.** :

## **OBJECTION TO CONFIRMATION**

COMES NOW, The Money Source Inc. (“Movant”), who holds a secured lien on Debtor’s real property known as 80 Creekside Way, Newnan, GA 30265, and objects to confirmation of Debtor’s proposed Chapter 13 Plan on the grounds that it does not comply with the provisions of 11 U.S.C. § 1322, 11 U.S.C. §1325 and 11 U.S.C. §506. In particular, Movant objects to Debtor’s proposed Chapter 13 Plan on the following grounds.

1.

Movant is in the process of filing a Proof of Claim in the approximate amount of \$237,288.73, including estimated pre-petition arrears in the amount of \$20,325.29.

2.

Debtor's Chapter 13 Plan as proposed fails to provide for curing the pre-petition arrearage owed to Movant during a reasonable period of time.

3.

Debtor's Chapter 13 Plan as proposed understates the amount of the prepetition arrears owed to Movant at the time of filing.

4.

Debtor's Chapter 13 Plan's projected monthly arrearage payment is insufficient to protect Movant's interest.

5.

Movant reserves the right to object to confirmation of Debtor's Chapter 13 Plan if Debtor fails to make ongoing direct post-petition mortgage payment as required by Debtor's proposed Chapter 13 Plan.

6.

Upon information and belief, Debtor's Chapter 13 Plan is not feasible.

7.

Debtor's Chapter 13 Plan is not in the best interest of Debtor and Creditors.

WHEREFORE, Movant hereby objects to confirmation of the Debtor's Chapter 13 Plan, and requests that the Court decline to approve Debtor's Chapter 13 plan and grant such additional relief as the Court deems just and proper.

/s/Chad R. Simon  
Chad R. Simon  
Georgia Bar No. 646919  
Bonial & Associates  
Chad R. Simon  
Managing Georgia Attorney  
P.O. Box 80727  
Atlanta, GA 30366  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing Objection to Confirmation has been furnished by Electronic Mail or regular U. S. Mail to all parties listed below on this 28th day of March, 2021.

John Ronald Long  
80 Creekside Way  
Newnan, GA 30265-6064

Dan Saeger  
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Melissa J. Davey  
Melissa J. Davey, Standing Ch 13 Trustee  
Suite 200  
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/s/ Chad R. Simon  
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